

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LAKAIYA HARRIS,

Plaintiff,

v.

Case No. 18-cv-12751
Hon. Matthew F. Leitman

PERFECTING CHURCH d/b/a Perfecting
Church Corporation and MARVIN L.
WINANS,

Defendants.

**STIPULATION TO EXTEND THE DATE FOR COMPLETION OF FACT
DISCOVERY FROM AUGUST 9, 2019 TO OCTOBER 9, 2019 AND TO
EXTEND THE DATE FOR FILING DISPOSITIVE MOTIONS FROM
OCTOBER 9, 2019 TO NOVEMBER 9, 2019**

Plaintiff LAKAIYA HARRIS (“Plaintiff”) and Defendants PERFECTING CHURCH d/b/a Perfecting Church Corporation and MARVIN L. WINANS (“Defendants”), by and through their respective counsel, hereby jointly move and for an extension of the date for completion of fact discovery from August 9, 2019 until October 9, 2019.

The factual bases for this request are as follows:

1. This is a civil action seeking relief under the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201 et seq., the Michigan Workforce Opportunity Act

(“WOWA”), Mich. Comp. Laws § 408.411 et seq., and the Michigan Elliott Larsen Civil Rights Act (“ELCRA”), Mich. Comp. Laws § 37.2101 et seq.

2. This action was commenced on September 5, 2018 (ECF No. 1).
3. Defendants answered the complaint on October 26, 2018 (ECF No. 2).
4. On January 4, 2019 the Court issued a Case Management Requirements and Scheduling Order which, inter alia, set June 7, 2019 as the date for completion of fact discovery.
5. On April 23, 2019, Plaintiff filed a Joint Motion to Extend Fact Discovery (ECF 13). The motion contained detailed information regarding the basis for the request.
6. On April 29, 2019, the Court issued a Stipulated Order Extending the Date for Completion of Fact Discovery from June 7, 2019 to August 9, 2019.
7. On May 14, 2019, Plaintiff furnished responses to the Defendants’ First Request for Production of Documents and Interrogatories.
8. On May 21, 2019, Plaintiff served Plaintiff’s First Request for Production of Documents and Interrogatories upon counsel for Defendants.
9. On July 10, 2019, Defendants furnished Responses to Plaintiff’s First Request for Production of Documents and Interrogatories.

10. On July 13, 2019, Plaintiff received Defendants' Responses to Plaintiff's First Request for Production of Documents and Interrogatories to Defendant, via USPS First Class Mail.

11. Thereafter, the parties have engaged in good faith to resolve a number of discovery-related issues. This effort is ongoing.

12. In order to resolve the discovery issues without court intervention and to schedule the appropriate depositions in this case, the parties request an extension of fact discovery from August 9, 2019 until October 9, 2019.

13. The extension of fact discovery from August 9, 2019 until October 9, 2019 will not affect the final pretrial conference, or trial dates. However, it will require an extension of the date for filing dispositive motions from October 9, 2019 to November 9, 2019.

14. For the foregoing reasons, the Parties request that the Court So-Order this stipulation to extend the date for completion of fact discovery from August 9, 2019 to October 9, 2019 and to extend the date for filing dispositive motions from October 9, 2019 to November 9, 2019.

Dated: August 2, 2019

/s/Steven John Moser
MOSER LAW FIRM, P.C.
Attorneys for Plaintiff
3 School Street
Suite 207B
Glen Cove, New York 11542
Phone: (516) 671-1150
Fax: (516) 882-5420
smoser@moseremploymentlaw.com

/s/ Jack W. Schulz
SCHULZ GOTHAM PLC
Attorney for Plaintiff
PO Box 44855
Detroit, MI 48244
(313) 652-1906
jackwschulz@gmail.com
egotham@schulzgotham.com

/s/Reginald Turner
CLARK HILL PLC
Attorneys for Defendants
500 Woodward Avenue, Suite 3500
Detroit, Michigan 48226
(313) 965-8356
rturner@clarkhill.com

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LAKAIYA HARRIS,

Plaintiff,

v.

Case No. 18-cv-12751
Hon. Matthew F. Leitman

PERFECTING CHURCH d/b/a Perfecting
Church Corporation and MARVIN L.
WINANS,

Defendants.

**ORDER EXTENDING THE DATE FOR COMPLETION OF FACT
DISCOVERY AND FILING DISPOSITIVE MOTIONS**

IT IS HEREBY ORDERED that Parties' deadline for the completion of fact discovery set forth in this Court's April 29, 2019 Stipulated Order will be extended from August 9, 2019 to October 9, 2019 and that the date for filing dispositive motions will be extended from October 9, 2019 to November 9, 2019.

/s/Matthew F. Leitman
MATTHEW F. LEITMAN
UNITED STATES DISTRICT JUDGE

Dated: September 3, 2019